

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

LEONARD C. JEFFERSON,)	
)	
Plaintiff,)	
)	Civil Action No. 04-044E
V.)	
)	District Judge McLaughlin
SECRETARY JEFFREY A. BEARD;)	Magistrate Judge Baxter
GLENN McQUOWN; ROBERT BOEH;)	
PATRICIA GAMBLE; MICHAEL)	
SNYDER; PATRICIA McKISSOCK;)	
UNIT MANAGER TIMOTHY)	
HAMETZ,)	
)	
Defendants.)	Electronically Filed.

**DEFENDANTS' MOTION FOR EXTENSION OF TIME TO RESPOND TO
PLAINTIFF'S INTERROGATORIES**

AND NOW, come the defendants Jeffrey Beard, Robert Boeh, Glenn McQuown, Patricia Gamble, Michael Snyder, Patricia McKissok, and Unit Manager Timothy Hametz, by their attorneys, Thomas W. Corbett, Jr., Attorney General, Mary Lynch Friedline, Senior Deputy Attorney General, and Susan J. Forney, Chief Deputy Attorney General, Chief Litigation Section, and based on the following, respectfully request a brief extension of time (14 days) to respond to Plaintiff's Interrogatories:

1. Plaintiff has served a set of 23 Interrogatories (combined with document requests) upon defendants. Responses were due today, September 5, 2006.
2. During the August 28, 2006 status conference, when counsel advised the Court that defendants were working on the responses, she believed that defendants would be able to respond to the interrogatories in a timely fashion. However, because several of the defendants are either retired and/or have moved to different institutions, it has been

impossible to obtain all of the necessary information for completing the responses within the time allowed under the Rules.

3. Counsel believes that complete responses can be provided within another 14 days, if not earlier. Accordingly, defendants request an additional 14 days, until September 19, 2006, to submit their responses to plaintiff's interrogatories.

4. This minor delay will not prejudice plaintiff. The Court has set a discovery deadline of December 15, 2006, and thus, he will have two more months from the extension date to submit further discovery requests (although he has already submitted 23 interrogatories directed to the defendants as a group).

WHEREFORE, defendants request an additional 14 days to respond to plaintiff's interrogatories.

Respectfully submitted:

Thomas W. Corbett, Jr.
Attorney General

By: /s/ Mary Lynch Friedline
MARY LYNCH FRIEDLINE
Senior Deputy Attorney General
Attorney I.D. No. 47046
Susan J. Forney
Chief Deputy Attorney General
Litigation Section

Office of Attorney General
6th Fl., Manor Complex
564 Forbes Avenue
Pittsburgh, PA 15219
Date: September 5, 2006

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of September, 2006, I electronically filed the foregoing *Motion for Extension of Time to Respond to Plaintiff's Interrogatories* with the Clerk of Court using the CM/ECF system. This document will be mailed via U.S. mail to the following non CM/ECF participants:

Leonard C. Jefferson
CL-4135
SCI-Albion
10745 Route 18
Albion, PA 16475-0001

By: /s/ Mary Lynch Friedline
MARY LYNCH FRIEDLINE
Senior Deputy Attorney General

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